PRIVACY POLICY

Last updated in August 2021

Dias de Souza Advogados Associados ("Society" or "DSA"), in compliance with the principles listed in our Code of Ethics and Professional Conduct and committed to privacy, data protection and information security, prepared this Privacy Policy ("Policy").

This Policy is intended for our customers, third parties (suppliers, service providers, partners, etc.), participants of our events, users of our website and other holders who may interact with us on our pages and online media. In compliance with applicable law, especially Law No. 13.709 of 2018 ("General Law on Personal Data Protection" or "LGPD"), this Policy aims to communicate the guidelines and rules relating to the operations of processing personal data carried out by the DSA for the purposes listed here.

We ask that you read this Policy carefully and, if you have any questions, please contact us by e-mail: lgpd@dsa.com.br

1. Personal Data and Processing Purposes

When accessing our website or relating to us as a third party to the DSA, we will process the personal data necessary for the purposes set out herein, in accordance with the provisions of this section.

- Contact us: on the Contact tab of our website, under the option "Contact Us", there is a contact form for sending messages to the DSA, in which the following personal data are provided: name, e-mail address, company, telephone number, state and country, as well as any personal data that the owner decides to share voluntarily in the message field. Personal data will only be processed for the purpose of answering the user's contact with us. The DSA recommends users to share only the personal data strictly necessary when contacting us.
- Work with us: on the Contact tab of our website, under the option "Work with us", there is a contact form for those interested in joining the DSA team, in which the following personal data are provided: name, email address, company, telephone, state and country, as well as any personal data that the holder voluntarily decides to share in the message field and when attaching his/her resume. Personal data will only be processed for selective processes, in line with our internal HR policies and procedures. The DSA recommends users to share only the personal data strictly necessary when contacting us.
- Events and newsletters: the DSA treats personal data such as name, email, company and title to enable participation in online or face-to-face events and to send material and news of interest. In online events, the participant can have the option to interact with the camera and microphone open, in which case they will be subject to the privacy policy of the platform in question. In face-to-face events, the participant can have their image collected by security cameras, present in our facilities for the safety and integrity of everyone.

- Interactions on our pages: when accessing our website, the DSA may collect
 data related to your browsing (IP, date and time of access) to analyze your
 interaction with us and to comply with legal obligations. The DSA may also
 collect data such as clicks, likes, comments and analytics in order to improve
 our materials and public communications. These analyzes will take place
 based on our DSA social media pages. <u>LinkedIn</u>, <u>Facebook</u> e <u>Instagram</u>.
- **Suppliers**: the DSA will collect data necessary for qualification and bank details to enter into and execute contractual instruments, register for access to our physical facilities when necessary, as well as make payments to the respective third parties (whether suppliers, service providers, partners, etc.).

2. Cookies

Cookies are small text files that are automatically downloaded to your device when you access and browse a website. They basically serve to identify devices, activities and user preferences. DSA uses *cookies* on its website to analyze interaction with the pages visited and content engagement, as well as to personalize the user experience. The *cookies* used by DSA are:

COOKIE	TIPO
_ga	Performance
Purpose: This cookie is used to calculate visitor, session, campaign data and track website usage for website analytics reporting. Cookies store information anonymously and assign a randomly generated number to identify unique visitors.	
_gid	Performance
Purpose: This cookie is used to store information on how visitors use a website and helps in creating an analytical report on how the website is doing. The data collected includes the number of visitors, the source they came from and the pages visited anonymously.	
_gat	Performance
Purpose: This cookie is installed to control the request rate and limit data collection on high traffic websites.	
Translate	Required
Purpose: This cookie is for internal and secure use by the website	

You can disable the collection of performance and advertising cookies in your browser settings. When disabling cookies, it is important to keep in mind that the user experience may be impaired, as information used to personalize it will no longer be used.

3. Sharing and International Transfer

As a rule, our Society does not share your personal data. Despite this, it is possible that we do so to conduct our business (as third parties that provide us with information technology and security services and an accounting office), as well as to compress legal and/or regulatory obligations or for the regular exercise of rights in legal proceedings, administrative or arbitration. In all cases, the DSA will select third parties who meet our data protection and information security standards.

The DSA is headquartered in Brazil, and the processing of personal data and other responsibilities is primarily governed by the LGPD. However, personal data that are transferred to other countries (such as in the case of cloud services) may be subject to local legislation and other related rules, in which case we will do so following the provisions of the LGPD on international transfer and in compliance with our data protection standards.

4. Storage Period

Personal data collected by the website are stored and used for a period of time that corresponds to that necessary to achieve the purposes listed in this document and in compliance with the provisions of the LGPD. In addition, the DSA may also store personal data for the period necessary to comply with legal and/or regulatory obligations, as well as for any regular exercise of rights in judicial, administrative or arbitration proceedings, for the appropriate periods.

Once the storage periods for personal data are reached, they are deleted from our databases or anonymized, when possible.

5. Security measures

The DSA employs technical and administrative measures capable of protecting personal data from unauthorized access and from situations of destruction, loss, misplacement or alteration of this data, in physical and digital environments. The measures we use take into account the nature of the data, the context and purpose of the processing, the risks that a possible violation would generate for the user's rights and freedoms, and the standards currently used in the market by companies similar to ours.

Among the security measures adopted by us, we highlight:

Access control and access limitation according to privileges;

- Monitoring of physical access to servers;
- Internal Audit on email traffic;
- Antivirus and firewall;;
- User authentication;
- Traceability of information;
- Internal policies and procedures aimed at privacy, data protection, information security and *compliance*.

Even if you adopt everything in your power to avoid security incidents, it is possible that there may be a problem caused exclusively by a third party - such as in the case of hacker or cracker attacks, or even in the case of the user's sole fault, which it occurs, for example, when he himself transfers his data to a third party. In any case, in the event of any type of security incident that could generate relevant risk or damage to any of our users, we will notify the affected holders and the National Data Protection Authority about what happened, in accordance with the provisions of the LGPD and in our internal policies.

In addition, our website and our online pages may provide links to third parties, which have their own security standards and privacy policies. In these cases, the user understands that he is subject to such third parties, not linked to the DSA, who cannot be held responsible for their practices and contents.

6. Rights of Holders

As a holder, you have certain rights such as: confirming the existence of treatment; access your personal data; and correct incomplete, inaccurate or outdated data.

The DSA guarantees the exercise of these rights free of charge, except in cases where a fee is permitted by applicable legislation or ANPD regulations. For this purpose, the holder should contact us at the address: lgpd@dsa.com.br

To ensure that the user who intends to exercise their rights is, in fact, the owner of the personal data object of the request, we may request documents or other information that can help in their correct identification, in line with our privacy and data protection policies and procedures.

7. Changes to this policy

The present version of this Privacy Policy was last updated on: August 2021.

We reserve the right to modify these rules at any time, especially to adapt them to any changes made to our website, either by making them available new functionalities, either by suppressing or modifying existing ones. In this case, the new version will be made available on the DSA pages.

8. Controller Data

The controller of personal data responsible for this Policy is Dias de Souza Advogados Associados, headquartered at Avenida Brasil, 1575, Jardim América, São Paulo/SP, Brazil, CEP 01431-001.

To clarify any doubts about this Privacy Policy or about the personal data we handle, contact our Personal Data Protection Officer, through one of the channels mentioned below:

E-mail: lgpd@dsa.com.br

Telephone: +55 11

30694191

Postal address: Av. Brasil, 1575 Jardim América CEP:

01431-001

São Paulo - SP - Brazil